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December 14, 2015

Via ECF

Hon. Steven I. Locke, U.S.M.J.
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722

Re: Siancas et al. v. Exclusive Detailing Inc. et al.
Docket No.: 2:14-cv-6151

Dear Judge Locke:

This office represents defendant Exclusive Detailing Inc. ("EDI" or "Defendant") in the above referenced matter. The follow is an update on the two discovery issues that the court has issued an order:

1. USB Flash Drive to Plaintiff's Counsel:

Defendants have complied and provided Plaintiff's counsel with the documents from Defendants on a USB drive. They are the exact documents that Defendants have emailed to my office. Plaintiff's counsel has advised me that he is still not satisfied. Quite frankly, he has what we have. So I do not know what his issue is. The metadata indicates that the documents were created in 2012, far and away, prior to this litigation. As such, Plaintiff's counsel's "suspicions" are now baseless.

2. Defendants' Supplemental Responses to Plaintiff's Interrogatories:

Pursuant to Your Honor's order (Docket 107), Defendants' more responsive answers to Plaintiff's interrogatories are due today December 14, 2015.

Michael Agoila, the owner of Exclusive Detailing, Inc. ("EDI") is out of state seeking employment. He will be returning on December 22, 2015. Carl Del Almeida is out of the country in Portugal taking care of his elderly parents. I will need to meet with Mr. Agoila, and as such, respectfully request a short extension so that Defendants can complete the more responsive answers to Plaintiff's interrogatories. I am respectfully requesting until December 30, 2015.

I have conferred with all counsel on this request. Co-defendants do not object. Plaintiff's counsel does not consent.

Thank you for your consideration and courtesies.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/

cc: Steven Moser, Esq. (Plaintiff's counsel)
Melissa Stannard, Esq. (Co-Defendants' counsel)
James McGrath, Esq. (Co-Defendants' counsel)